

Kevin S. Wang, Esq.  
Wood Wang & Associate, PLLC  
Counsel for Plaintiffs

May 2, 2025

VIA ECF

The Honorable Brian M. Cogan  
United States District Court, Eastern District of New York  
225 Cadman Plaza East, Brooklyn, NY 11201  
Wing88 Realty LLC v. Gloryland Development, LLC,  
Case No.: 25-cv-00035-BMC  
***RE: Untimely filing the Second Amendment***

Dear Judge Cogan,

This Firm is the counsel for Plaintiffs in the above-captioned case. The undersigned counsel respectfully this case either temporarily stay this case or dismiss without prejudice or, alternatively, allow the undersigned to file Motion to withdraw as attorney of record.

First of all, the undersigned counsel appreciate Your Honor granting the undersigned counsel' first time to request extension of Letter Motion to file the Second Amended Complaint until today because one of Plaintiff Mr. Wing Fung Chau was taken away by the NYPD during his deposition in a civil case. When he was released from the Custody, he is actively defending the allegedly baseless charges because he believes he is innocent for all charges which are just from some civil disputes and should be disposed of in the civil proceedings.

When the undersigned is working on the second amended complaint to be finalized for filing which is due today, some of facts are in need of Plaintiff Mr. Chau for further verification. Unfortunately, he does not have time to work with me for this case for timely filing the second amendment because of the above personal reasons in defending his own case. Therefore, the undersigned cannot make it timely filing without Mr. Chau's support and he cannot tell me a definite time for when he would be ready to work with me for filing a second amendment. Thus, the undersigned cannot file a second request for extending time to file the second amendment as ordered by this Court.

Therefore, the undersigned counsel respectfully requests Your Honor either temporarily stay this case for the incident that happened to Plaintiff Mr. Chau or dismiss this case without prejudice for untimely filing the amended complaint or, alternatively, allow the undersigned counsel file Motion to withdraw from this case as attorney of record because the undersigned cannot move forward at this moment without the client actively cooperating for this case.

Thank you for Your Honor in considering this matter.

*Respectfully Submitted,*  
/s/ Kevin Wang  
Kevin S. Wang, Esq.

CC: All attorneys of record via ECF